

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**LINDA J. BLOZIS,**

**Plaintiff,**

**VS.**

**MELLON TRUST OF DELAWARE,  
NATIONAL ASSOCIATION; MELLON  
BANK, NATIONAL ASSOCIATION;  
MELLON FINANCIAL  
CORPORATION,**

**Defendants.**

: CIVIL ACTION NO. 05-891 (SLR)

**DEFENDANTS' MOTION IN LIMINE TO EXCLUDE PLAINTIFF'S  
IRRELEVANT EVIDENCE OF ALLEGED FRONT PAY DAMAGES**

Defendants Mellon Trust of Delaware, National Association, Mellon Bank, National Association, and Mellon Financial Corporation (collectively, “Defendants”) hereby move this Court, for an Order in the form attached hereto precluding Plaintiff from offering evidence of alleged front pay damages to the jury, along with such other and further relief the Court deems just, proper, and equitable. The grounds for this motion are set forth fully in the accompanying

memorandum of law dated May 22, 2006, the exhibits thereto, and upon all of the pleadings and proceedings heretofore had herein.

Respectfully submitted,

REED SMITH LLP

By: /s/ Thad J. Bracegirdle

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Delaware National Association, Mellon Bank,  
National Association, and Mellon Financial  
Corporation.

Dated: May 22, 2007

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FOR THE DISTRICT OF DELAWARE

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: CERTIFICATE OF SERVICE  
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I, Thad J. Bracegirdle, being a member of the Bar of this Court, do hereby certify that on May 22, 2007, I caused a true and correct copy of **DEFENDANTS' MOTION IN LIMINE TO EXCLUDE PLAINTIFFS' EVIDENCE OF CONCERNING ALLEGED FRONT PAY DAMAGES** to be served by electronic filing with the Court upon the following counsel of record:

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And

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s/Thad J. Bracegirdle  
Thad J. Bracegirdle (No. 3691)